

## Call for Data Related to Review of National Monuments under EO 13792 (April 26, 2017)

1. Information on activities permitted at the Monument, including annual levels of activity from the **date of designation to the present (Designation date for GSENM is September 18, 1996)**
  - a. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
    - o The annual production of oil and gas in the Grand Staircase Escalante National Monument (GSENM) is currently occurring in or adjacent to the Upper Valley Unit (UVU) in the north-central area of the GSENM (Attachment Upper Valley Unit Map). Four wells within the GSENM are currently producing oil and a small amount of gas. The UVU was approved in 1962 and production from the wells peaked in 1972 at 183,133 bbls. In the last 20 years, 1997-2016, production has slowly declined from about 65,828 bbls oil and no gas annually to 45,538 bbls oil and 2357 mcf of gas. (Attachment: *Historical Oil and Gas Production GSE National Monument Upper Valley Field*)
    - o No coal lands have been explored or coal produced within the GSENM since the September 18, 1996 declaration. Existing coal leases were cancelled in exchange for Federal payments totaling \$42 million<sup>1</sup> (1/1/2017 \$'s<sup>2</sup>).
    - o Lands with an estimated 156.3 million tons of coal were exchanged to the State of Utah for State lands<sup>3</sup> in the GSENM with a current market value of \$6.2 Billion and royalty value of \$500 million. Tons remaining after the 156.3 million tons are produced, would revert to the Federal government.
    - o Further, lands with an additional 45+ million tons<sup>4</sup> (market value \$1.8 Billion and a royalty value of \$144 million) will not revert to the Federal government until the State of Utah State Institutional Trust Lands (SITLA) receives \$26,012,210 (plus interest) in royalty and rental.<sup>5</sup> As of 1 January 2017, the principal plus interest totaled \$34.7 million<sup>6</sup>. Any tons of the 45+ million tons remaining after

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<sup>1</sup> Attached: "GSENM Coal Lease Cancellation Payments"

<sup>2</sup> [https://data.bls.gov/timeseries/WPU051?data\\_tool=XGtable](https://data.bls.gov/timeseries/WPU051?data_tool=XGtable)

<sup>3</sup> Attached: "2017 Exchange Tract memo"

"MOU SITLA-BLM-FS Land Exchange Pub Law No 105-335 Stat 3139 ratified 8 May 1998"

<sup>4</sup> [http://www.ecprogress.com/news/cottonwood-tract-out-for-lease/article\\_e165c9af-708a-5abb-b6a0-0180658ebaec.html](http://www.ecprogress.com/news/cottonwood-tract-out-for-lease/article_e165c9af-708a-5abb-b6a0-0180658ebaec.html)

<sup>5</sup> Attached: "MOU SITLA-BLM-FS Land Exchange Pub Law No 105-335 Stat 3139 ratified 8 May 1998"

<sup>6</sup> Attached: "2017 Exchange Tract memo" – "Cottonwood Tract... Dollar value..." times two

the total of all payments are completed, revert to the Federal government

- At year-end 2016 the State had recovered 26.3 million tons<sup>7</sup> and received \$57.2 million in payments<sup>8</sup> from the exchanged coal. The Federal government does not receive any revenue or compensation from those payments.
- BLM also provides mine inspection and technical advice to SITLA.<sup>9</sup>

b. Minerals - annual mineral production on site

- Mineral materials
  - No new Free Use and OTC permits issued since Monument designation. There were 8 Mineral Material Cases in the monument. A number of them were Free Use Permits granted to the county.
  - Valid existing permits, including those in Title 23 (3 Federal Highway Rights of Way), continue to be in effect  
According to UGS Circular 93, January 1997, "A Preliminary Assessment of Energy and Mineral Resources within the Grand Staircase-Escalante National Monument", there were five small mining operations on unpatented mining claims, four of which were active alabaster quarries and one, a suspended operation for petrified wood. Annual production of the alabaster was about 300 tons worth \$500 per ton (\$150,000/yr.). The decision to close the claims due to missing the filing date was upheld by IBLA in March of 2008. Since that time there has been no mining law operations within the monument.

3. Information on activities occurring during the **5 years prior to designation**

- a. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
- From 1992 until 1996, 336,313 bbls of oil and no gas was produced in the GSENM (Attachment: *Historical Oil and Gas Production GSE National Monument Upper Valley Field*).
    - No coal was produced from the GSENM in the prior 5 years.  
However, exploration activities and planning for mining continued

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<sup>7</sup> Attached: "2017 Exchange Tract memo"

<sup>8</sup> Attached: "A Bedingfield to J McKenzie 16 May 2017"

<sup>9</sup> Attached: "MOU SITLA-BLM-FS Land Exchange Pub Law No 105-335 Stat 3139 ratified 8 May 1998"

from the 1980's until the monument declaration.

- 700+ exploration drill holes were completed
- 64 Coal leases with some 168,000 acres were committed
- An electrical energy facility was evaluated and proposed in the 1960's<sup>10</sup>
- A regional EIS for mining was completed<sup>11</sup>
- A major coal mine was planned as described in 1994<sup>12</sup>

Grand Staircase-Escalante National Monument Existing Rights-of-Way/Permits/Authorized 09/25/1996 – 05/15/2017	
Existing Withdrawals: PSR, PWR, Bureau of Reclamation, Forest Service Wilderness, Power Site, National Park Service, In Trust for Indians,	17
Road ROWs	19
Misc. Roads & Associated Uses - Sec 107 Federal Aid Hwy, RS2477, Mineral Material Sites	0
Power Transmission Lines & Power Facilities	20
Communication Sites – Telephone, Telegraph, Radio Transmission, Global Positioning Systems	15
Water ROWs, Irrigation Facilities	14
Oil & Gas Pipelines, Oil & Gas Facilities	5
Other FLPMA ROWs, Perpetual Easements, Federal Facilities	2
Airport	0
Permit - 302 FLPMA – Misc.	0
Permits Film - 302 FLPMA (popular location (closed))	54

b. Minerals - annual mineral production on site

As far as mining law operations (3809), the alabaster quarries were the only authorized operation (06/30/1986) in the area prior to designation.

4. Information on activities that likely would have occurred annually from the date of designation to the present **if the Monument had not been designated**

**The answers to this question would be highly speculative and is best answered with qualitative (rather than quantitative) data. As GSENM was designated 20 years ago,**

<sup>10</sup> <http://www.hcn.org/issues/16/492>

<sup>11</sup> Attached Title Pages: "FINAL EIS - Dev of Coal Resources in Southern Utah Part 1 Regional"

<sup>12</sup> <http://www.hcn.org/issues/16/492>

**the factors affecting such projections are subject to a wide range of variables (many of which are outside of BLM's purview, such as market prices).**

- a. Energy - annual production of coal, oil, gas and renewables (if any) on site; amount of energy transmission infrastructure on site (if any)
  - o Except for the Upper Valley Field, there have been no oil and gas discoveries within the GSENM. Forty-seven exploratory wells have been drilled; an average of 57 square miles per well (Attachment: M. Lee Allison, page iv). An Application to Drill was submitted for valid existing leases within the Circle Cliffs Unit, but was never approved and the lessee allowed the leases to terminate. Had the GSENM not hindered exploration, there possibly would have been more discover and development. Since there have been no discoveries upon which to base production numbers, estimates of the value of production vary widely. In January 1997, it was speculated that total value of Coal-bed gas and petroleum within the GSENM ranged between 2.02 and 18.6 billion dollars (Attachment: M. Lee Allison, page ii). The report from which these estimates were derived was the basis for a land swap of the Utah State Institutional Trust Lands within the GSENM and BLM administered lands within Drunkards Wash in Carbon County. Drunkards Wash has more than 400 producing wells and which by 2013 had generated \$140 million dollars in royalties for the agency (Attachment *Trust Lands Administration Fiscal Year 2013 Annual Report*).
  - o Coal Energy would have been produced and marketed as demonstrated by the ongoing Alton coal mine producing from private fee lands. As market conditions allowed, development of relatively remote and isolated areas of Utah would have proceeded providing employment and housing. State and County revenues would have increased significantly and Federal expenditures to exchange for the GSENM world-class coal resources would have been saved. State energy exports would have increased significantly. Recent advances in underground coal mining techniques would have been applied opening up additional large areas of Kaiparowits coal resources not considered minable in the 1990's.
  - o The underground mining methods would have had little or very limited impact on tourism activities. The limited surface mining would have been properly reclaimed after the short-term use of the land. Clean world coal energy production would have benefitted from additional underground production within a setting of strict environmental regulation and enforcement.

Grand Staircase-Escalante National Monument Existing Rights-of-Way/Permits/All Dispositions Authorized/Closed/Relinquished/Withdrawn/Expired/Terminated/Cancelled/Pending/Rejected/Void 01/01/1991 – 09/24/1996 (In March 1999, BLM added Case Recordation components to the LR2000 Database System; therefore, some of the pre-LR2000 data may remain in the Status Database)	
Existing Withdrawals: PSR, PWR, Bureau of Reclamation, Forest Service Wilderness, Power Site, National Park Service, In Trust for Indians,	1
Roads ROWs	8
Misc. Roads - Sec 107 Federal Aid Hwy, RS2477, Mineral Material Sites	1
Power Transmission Lines & Power Facilities	1
Communication Sites – Telephone, Telegraph, Radio Transmission, Global Positioning Systems	1
Water ROWs, Irrigation Facilities	0
Oil & Gas Pipelines, Oil & Gas Facilities	2
Other FLPMA ROWs, Perpetual Easements, Federal Facilities	6
Airport	0
Permit - 302 FLPMA – Misc.	25
Permits Film - 302 FLPMA (popular location (closed))	0

b. Minerals - annual mineral production on site

According to the same UGS report referenced above concerning the alabaster quarries, “Over a 30-year period, the quarries should generate \$4.5 million in production.”

Although there were initially 79 mining claims within the monument at its designation, the only ones with an active operation were the alabaster quarries mentioned in the UGS report.

Furthermore, the UGS mineral report stated, “Various types of metallic-mineral deposits are known to be present in the monument (figure 14). Most of these are small and low-grade with uncertain likelihood of significant development.” The UGS report addressed specific minerals with known or potential deposits within the monument, but they determined at that time they were probably not commercial quality due to low, often sub-economic grades and limited tonnage.

I would suspect that the alabaster operation would have continued, if the designation was not in place at the time they miss-filed their mining claim paperwork, they would have only had to re-locate the claims.

There would most likely be Mineral Material sites for sand and gravel and the Free Use Permits granted to Kane County would most likely still be in-use. This is a relatively small amount of material, but it is for the convenience of the county and the public to use.